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February 28, 2024

VIA ECH Hon. Denise L. Cote, U.S.D.J. Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Schottenstein et als. v. Lee et als., Case No. 22-cv-01197-DLC; Conflict with March 18, 2024 Trial Date; Request to Reschedule

Dear Judge Cote:

I serve as a lead counsel in the captioned matter on behalf of Plaintiffs. In response to the Court's Order entered January 31, 2024 [D.E. 120], I am advising your Honor that my trial before the New Jersey Superior Court, Law Division – Monmouth County in the *Eddi* case has been confirmed to begin on March 18, 2024. As noted in the foregoing Order, if *Eddi* proceeds to trial, the captioned matter will be given a new trial date. Since the *Eddi* trial will encompass a full week and possibly more, I respectfully suggest that the new trial date be scheduled for after April 1, 2024.

In addition, I am requesting a seven (7) day extension for the submission of the Joint Pretrial Order currently due March 1, 2024. Plaintiffs and Defendants have been negotiating certain stipulations in an effort to reduce motions in limine, but have not completed those discussions. The brief delay requested should result in a more efficient disposition of this case.

I have presented the foregoing information and request to adversary counsel, but I have not received their response. I trust that should they have an objection, they will advise the Court.

Respectfully submitted, /s/ *Jeffrey A. Donner*.

cc: Adversary Counsel